

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

TRACEY DAMRAU, *et al.*,

Plaintiffs,

v.

COLIBRI GROUP, LLC.

Defendant.

Case No. 4:24-cv-01441-SEP

**JOINT MOTION FOR ENTRY OF  
STIPULATED PROTECTIVE ORDER**

According to Federal Rule of Civil Procedure 26(c), Plaintiffs and Defendant Colibri Group, LLC (“Defendant”) (referred to jointly as the “Parties”), by their respective counsel, jointly request that the Court enter the agreed to protective order attached to this Motion (“Joint Stipulated Protective Order”). In support, the Parties state as follows:

1. Plaintiffs assert a putative class action claim under the Video Privacy Protection Act, 18 U.S.C. § 2710. (Doc. 15).
2. Fed. R. Civ. P. 26(c) provides a process, in appropriate cases, to limit the discovery or dissemination of certain information. Upon a showing of good cause and as justice may require to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense, a court may enter a protective order providing that the discovery not be had or be had only on specified terms or conditions. Fed. R. Civ. P. 26(c)(1) and (2).
3. The Parties anticipate that discovery in this matter will involve the disclosure of sensitive information by and between themselves and nonparties, such as proprietary research, formulas, algorithms, policies and procedures, product analysis, marketing analysis and data,

revenue and financial data, trade secrets, user information in which non-parties possess privacy interests, or other information required by law or agreement to be kept confidential.

4. The entry of the Joint Stipulated Protective Order will serve to protect the discovery and dissemination of the Parties' and nonparties' confidential information, the disclosure of which would lead to potential annoyance, embarrassment, oppression, or undue burden and expense. Fed. R. Civ. P. 26(c)(1).

WHEREFORE, the Parties request that the Court grant this Motion and enter the attached Joint Stipulated Protective Order.

Respectfully submitted,

July 9, 2025

By: /s/ Elliot O. Jackson (with consent)  
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**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I hereby certify that on July 9, 2025, the foregoing was electronically filed with the Clerk of the Court and served by operations of the Court's electronic filing system upon all counsel of record.

/s/ Paul Croker